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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND AD HOC GROUP OF  
INTERCONNECTION CUSTOMERS TO  
CONTINUE HEARING ON MOTION TO  
COMPEL PAYMENT OF PASS-  
THROUGH AMOUNTS WITHHELD BY  
PACIFIC GAS AND ELECTRIC  
COMPANY**

Re: Dkt. Nos. 4400

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Ad Hoc Group of  
4 Interconnection Customers (the “**Ad Hoc Group of Interconnection Customers**”), on the other.  
5 The Debtors and the Ad Hoc Group of Interconnection Customers are referred to in this  
6 Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The  
7 Parties hereby stipulate and agree as follows:

8 **RECITALS**

9 A. On October 22, 2019, the Ad Hoc Group of Interconnection Customers filed the  
10 *Motion and Memorandum of the Ad Hoc Group of Interconnection Customers to Compel*  
11 *Payment of Pass-Through Amounts Withheld by Pacific Gas and Electric Company* [Dkt.  
12 No. 4400] (the “**Motion**”) which is currently set for a hearing at 10:00 a.m. on November 13,  
13 2019 (the “**Hearing**”). Any response or opposition to the Motion by the Debtors or either  
14 official committee appointed in this case is due by 4:00 p.m. (Pacific Time) on November 8,  
15 2019.

16 B. The Parties have engaged in productive discussions regarding the Motion, and are  
17 working toward a consensual resolution of the Motion.

18 C. The Parties’ respective counsel have agreed that the Hearing be continued to the  
19 omnibus hearing scheduled for 10:00 a.m. on November 19, 2019, so that the Parties may  
20 continue their settlement discussions and propose a stipulated order on the Motion.

21 **NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND**  
22 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**  
23 **JOINTLY REQUEST THE COURT TO ORDER, THAT:**

24 1. The Hearing on the Motion is continued to 10:00 a.m. (Pacific Time) on  
25 November 19, 2019.

26 2. The time for the Debtors and the official appointed committees to respond  
27 to the Motion shall be extended to 4:00 p.m. (Pacific Time) on November 14, 2019.  
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Dated: November 8, 2019

WEIL, GOTSHAL & MANGES LLP  
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp  
Thomas B. Rupp

*Attorneys for Debtors  
and Debtors in Possession*

Dated: November 8, 2019

STOEL RIVES LLP

/s/ Andrew Morton  
Andrew Morton

*Attorneys for Ad Hoc Group of  
Interconnection Customers*